

DELBELLO DONNELLAN WEINGARTEN  
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*Proposed Attorneys for the Debtor*  
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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

FINGER LAKES CAPITAL PARTNERS, LLC

Chapter 11

Case No. 16-22112 (RDD)

Debtor.

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**SUPPLEMENTAL AFFIDAVIT OF LEE SHALOV, ESQ IN SUPPORT  
OF APPLICATION AUTHORIZING EMPLOYMENT AND  
RETENTION OF MCLAUGHLIN & STERN, LLP AS SPECIAL  
LITIGATION COUNSEL NUNC PRO TUNC TO THE PETITION DATE**

STATE OF NEW YORK                    )  
  ) ss:  
COUNTY OF NEW YORK                )

Lee Shalov, an attorney duly admitted to practice law in the Courts of the State of New York, states the following to be true under the penalties of perjury:

1. I am a member of McLaughlin & Stern, LLP ("M&S"), which maintains an office at 260 Madison Avenue, New York, New York 10016.

2. I submit this supplemental affidavit in further support of the application ("Application") of the debtor (the "Debtor") for the entry of an order authorizing the retention of M&S as Special Litigation Counsel to the Debtor.

3. During the ninety days before the Petition Date, October 30, 2015 through January 28, 2016, M&S did not receive any payments from the Debtor or from any other party on behalf of the Debtor.

4. Although M&S agreed to represent the Debtor at its normal hourly billing rates in connection with the action, *Jeffrey Keswin v. Finger Lakes Capital Partners, LLC, V. Zubin Mehta and Gregory Shalov* (the “New York Action”), as set forth in the Application, M&S has agreed to continue to represent the Debtor in the New York Action without compensation for legal fees, although M&S reserves the right to seek reimbursement of its costs upon application duly filed with this Court pursuant Bankruptcy Code §§ 330 and 331.

5. I know of no reason why M&S cannot act as Special litigation counsel to the Debtor, and respectfully request that M&S be so appointed.

/s/ Lee Shalov

Lee Shalov

Sworn to before me this  
20<sup>th</sup> day of April, 2016

/s/ Brad M. Jacobs

Notary Public